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June 18, 1999

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
JUN 21 10 22 AM '99

Federal Elections Commission  
General Counsel's Office  
Attn: F. Andrew Turley/Jennifer H. Boyt  
999 E Street, NW  
Washington, D.C. 20463

**Re: MUR 4893**

Dear Ms. Boyt:

As the designated counsel for Scott Aviation, a division of Scott Technologies, Inc. ("Scott Aviation"), I hereby respond to the complaint received by the Commission designated MUR 4893. The complaint alleges that Scott Aviation unlawfully denied a request by the International Union of Electronic, Electrical, Salaried, Machine & Furniture Workers (the "Union") to contribute to a PAC via payroll deduction. The complaint asserts a violation on the basis that Scott Aviation has a management PAC.

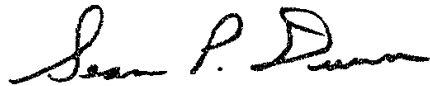
Scott Aviation is a division of Scott Technologies, Inc. ("Scott Technologies"), which is the successor corporation to Figgie International, Inc. ("Figgie"). Figgie historically operated a management PAC known as the Figgie International Employees Better Government Committee (the "Figgie PAC"). In recent years, the Figgie PAC has essentially been dormant, receiving annual contributions of approximately \$760 and making annual political contributions of approximately \$3670. The Figgie PAC currently has a cash balance of approximately \$12,500. For this reason, Scott Technologies desires to dispose of the remaining funds and to terminate the Figgie PAC effective June 30, 1999 (via the Semiannual Contribution Report 3X due July 31, 1999). (See attached affidavit of Michael R. Siedler, Assistant Treasurer for Scott Technologies, who has served as Treasurer of the Figgie PAC since March 17, 1997.)

There are currently no contributions being made to the PAC, and no employee has been permitted to contribute to the PAC via payroll deduction since January 29, 1999. Immediately prior to that date, seven employees of Interstate Electronics Corp., a wholly-owned subsidiary of Scott Technologies, were contributing a total of approximately \$60 per month to the PAC. No employees of Scott Aviation have contributed to the Figgie PAC since April 1994. As indicated by the attached affidavit of Ms. Ruth E. Stevenson, Vice-President Human Resources for Scott Aviation, a Union request that contributions be made to its PAC via payroll deduction was

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denied. Because the Figgie PAC is in a wind-down mode and will cease to exist in the immediate future, review of an alleged technical violation of 11 CFR § 114.5 would certainly not warrant use of the Commission's valuable resources. The allegation is at this point moot, and for that reason I respectfully request that it be dismissed.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sean P. Dunn". The signature is fluid and cursive, with the first name "Sean" and last name "Dunn" being clearly legible, and "P." as a small middle initial.

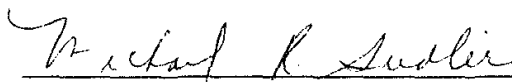
Sean P. Dunn

**Affidavit of Michael R. Siedler, Assistant Treasurer, Scott Technologies**

**Treasurer, Figgie Int'l Employees Better Govt. Cmte.**

**Re: MUR 4893**

I was appointed Treasurer of the Figgie International Employees Better Government Committee on March 17, 1997. Since that time, the PAC has been relatively inactive. The seven employees who were contributing to the PAC when I was appointed Treasurer ceased to make their contributions via payroll deduction as of January 29, 1999. After that date, contribution via payroll deduction has not been made available to management or other employees. I plan to dispose of the remaining PAC funds and close the PAC prior to the end of June 1999. (The FEC form 3X for the period from 1/1/99 - 6/30/99 will serve as the termination report.)

  
\_\_\_\_\_  
Michael R. Siedler

Sworn under oath before me and subscribed in my presence this 17 day of June, 1999.

  
\_\_\_\_\_  
Notary Public

CHERIA COSTELLO  
Notary Public - State of Ohio  
My Commission Expires January 21, 2003  
(Recorded in Lake County)

My Commission Expires: \_\_\_\_\_.

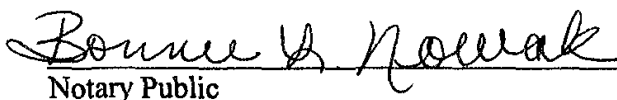
**Affidavit of Ruth E. Stevenson, Vice-President Human Resources, Scott Aviation**

**Re: MUR 4893**

I denied a request by the International Union of Electronic, Electrical Salaried, Machine and Furniture Workers (the "Union") to contribute to the IUE Committee on Political Education PAC Fund via payroll check-off. At the time, I was unaware that Federal election law required employers to make PAC contribution mechanisms available to Union members where such mechanisms are available to management personnel. At the time of such denial, the Union did not suggest otherwise.

  
Ruth E. Stevenson

Sworn under oath before me and subscribed in my presence this 17th day of June, 1999.

  
Notary Public

BONNIE L. NOWAK  
Notary Public, State of New York  
Qualified in Erie County

My Commission Expires 8-31-99 My Commission Expires: 8-31-99.